



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 14, 2022

VIA Email and ECF

The Honorable Katherine P. Failla
United States District Court
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: *United States v. Josette Dabo*, 22 Cr. 52 (KPF)

Dear Judge Failla:

The Government submits this letter in advance of the July 22, 2022 status conference scheduled in the above-captioned matter. On May 17, 2022, the Government received a mitigation request from defense counsel. The Government has reviewed the submitted materials and has requested supplemental information from defense counsel. The Government will not make a final decision on a potential plea offer until supplemental information is received and reviewed. Accordingly, the parties jointly request a 60-day adjournment in this matter to allow (i) defense counsel to gather supplemental materials, (ii) the Government to review the materials, and (iii) the parties to finalize discussions regarding a potential pretrial resolution. Should the Court grant this request, the Government respectfully requests that time be excluded under the Speedy Trial Act from July 22, 2022 until the date of the next scheduled conference. The Government submits that the proposed exclusion would be in the interest of justice as it would allow the parties to complete mitigation discussions and pretrial negotiations. Defense counsel does not object.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

by: Ashley C. Nicolas
Ashley C. Nicolas
Assistant United States Attorney

cc: Mark Gombiner, Esq.
Counsel for Josette Dabo

Application GRANTED. The conference in this matter is hereby ADJOURNED to **September 28, 2022, at 11:00 a.m.**

It is further ORDERED that time is excluded under the Speedy Trial Act between **July 22, 2022**, and **September 28, 2022**. The Court finds that the ends of justice served by excluding such time outweigh the interests of the public and Ms. Dabo in a speedy trial because it will permit the parties to consider a pre-trial disposition.

The Clerk of Court is directed to terminate the motion at docket entry 18.

Dated: July 15, 2022
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE